

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

MAG JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

IN RE: ZANTAC (RANITIDINE)
PRODUCTS LIABILITY
LITIGATION

MDL NO 2924
20-MD-2924

JUDGE ROBIN L ROSENBERG
MAGISTRATE JUDGE BRUCE REINHART

THIS DOCUMENT RELATES TO:
MOHAMMED MEKUNS
(Plaintiff Name(s))

JURY TRIAL DEMANDED

SHORT-FORM COMPLAINT

The Plaintiff(s) named below, by counsel, file(s) this Short Form Complaint against Defendants named below. Plaintiff(s) incorporate(s) by reference the allegations contained in the Master Personal Injury Complaint ("MPIC") in *In re: Zantac (Ranitidine) Products Liability Litigation*, MDL No. 2924 (S.D. Fla). Plaintiff(s) file(s) this Short-Form Complaint as permitted by Pretrial Order No. 31.

Plaintiff(s) select(s) and indicate(s) by completing where requested, the Parties and Causes of Actions specific to this case. Where certain claims require additional pleading or case specific facts and individual information, Plaintiff(s) shall add and include them herein.

Plaintiff(s), by counsel, allege as follows:

I. PARTIES, JURISDICTION, AND VENUE

A. PLAINTIFF(S)

1. Plaintiff(s) Mohammed Mekuns ("Plaintiff(s)") brings this action (check the applicable designation):

☒ On behalf of himself;
☐ In representative capacity as the _____, on behalf
of the injured party, (Injured Party's Name)
_____.
2. Injured Party is currently a resident and citizen of (City, State)
Philadelphia County, Pennsylvania and claims damages as set forth below.

—OR—

Decedent died on (Month, Day, Year)_____. At the time of
Decedent's death, Decedent was a resident and citizen of (City, State)
_____.

B. DEFENDANT(S)

4. Plaintiff(s) name(s) the following Defendants from the Master Personal Injury Complaint in this action:

a. Brand Manufacturers:

Boehringer Ingelheim; GlaxoSmithKline; Pfizer; Sanofi

b. Generic Manufacturers:

Ajanta Pharma USA Inc.; Amneal Pharmaceuticals of New York LLC; Aotex Corp; APPCO Pharma LLC; Aurbindo Pharma Ltd; Dr. Reddy's Laboratories; Glenmark Pharmaceuticals Ltd; Glenmark Pharmaceuticals Inc., USA; L. Perrigo Company; Novitium Pharma LLC; Par Pharmaceutical Inc.; Sandoz, Inc.; Strides Pharma Inc. (Strides Pharma Global Pte. Ltd); Sun Pharmaceutical Industries, Inc.; Teva Pharmaceuticals USA, Inc.; Wockhardt Ltd.

c. Distributors:

Granules USA Inc.

d. Retailers:

CVS

e. Repackagers:

Denton Pharma Inc. d/b/a Northwind Pharmaceuticals; Golden State Medical Supply Inc.; L. Perrigo Company; Par Pharmaceutical Inc.

f. Others Not Named in the MPIC:

C. JURISDICTION AND VENUE

5. Identify the Federal District Court in which Plaintiff(s) would have filed this action in the absence of Pretrial Order No. 11 (direct filing) [or, if applicable, the District Court to which their original action was removed]: **Eastern District of Pennsylvania.**
6. Jurisdiction is proper upon diversity of citizenship.

II. PRODUCT USE

7. The Injured Party used Zantac and/or generic ranitidine: [*Check all that apply*]
- ☒ By prescription
- ☒ Over the counter
8. The Injured Party used Zantac and/or generic ranitidine from approximately (month, year) **2004 to 2019.**

III. PHYSICAL INJURY

9. As a result of the Injured Party's use of the medications specified above, [*he/she*] was diagnosed with the following specific type of cancer (check all that apply):

Check all that apply	Cancer Type	Approximate Date of Diagnosis
<input checked="" type="checkbox"/>	BLADDER CANCER	September 2020
<input type="checkbox"/>	BRAIN CANCER	
<input type="checkbox"/>	BREAST CANCER	
<input type="checkbox"/>	COLORECTAL CANCER	
<input type="checkbox"/>	ESOPHAGEAL/THROAT/NASAL CANCER	
<input type="checkbox"/>	INTESTINAL CANCER	
<input type="checkbox"/>	KIDNEY CANCER	
<input type="checkbox"/>	LIVER CANCER	
<input type="checkbox"/>	LUNG CANCER	
<input type="checkbox"/>	OVARIAN CANCER	
<input type="checkbox"/>	PANCREATIC CANCER	
<input type="checkbox"/>	PROSTATE CANCER	
<input type="checkbox"/>	STOMACH CANCER	

<input type="checkbox"/>	TESTICULAR CANCER	
<input type="checkbox"/>	THYROID CANCER	
<input type="checkbox"/>	UTERINE CANCER	
<input type="checkbox"/>	OTHER CANCER: _____	
<input type="checkbox"/>	DEATH (CAUSED BY CANCER)	

10. Defendants, by their actions or inactions, proximately caused the injuries to Plaintiff(s).

IV. CAUSES OF ACTION ASSERTED

11. The following Causes of Action asserted in the Master Personal Injury Complaint are asserted against the specified defendants in each class of Defendants enumerated therein, and the allegations with regard thereto are adopted in this Short Form Complaint by reference.

Check if Applicable	COUNT	Cause of Action
<input checked="" type="checkbox"/>	I	STRICT PRODUCTS LIABILITY – FAILURE TO WARN
<input checked="" type="checkbox"/>	II	STRICT PRODUCTS LIABILITY – DESIGN DEFECT
<input checked="" type="checkbox"/>	III	STRICT PRODUCTS LIABILITY – MANUFACTURING DEFECT
<input checked="" type="checkbox"/>	IV	NEGLIGENCE – FAILURE TO WARN
<input checked="" type="checkbox"/>	V	NEGLIGENT PRODUCT DESIGN
<input checked="" type="checkbox"/>	VI	NEGLIGENT MANUFACTURING
<input checked="" type="checkbox"/>	VII	GENERAL NEGLIGENCE
<input checked="" type="checkbox"/>	VIII	NEGLIGENT MISREPRESENTATION
<input checked="" type="checkbox"/>	IX	BREACH OF EXPRESS WARRANTIES
<input checked="" type="checkbox"/>	X	BREACH OF IMPLIED WARRANTIES
<input checked="" type="checkbox"/>	XI	VIOLATION OF CONSUMER PROTECTION AND DECEPTIVE TRADE PRACTICES LAWS and specify the state's statute below: Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. §§201-1, et seq.

Check if Applicable	COUNT	Cause of Action
<input type="checkbox"/>	XII	UNJUST ENRICHMENT
<input checked="" type="checkbox"/>	XIII	LOSS OF CONSORTIUM
<input type="checkbox"/>	XIV	SURVIVAL ACTION
<input type="checkbox"/>	XV	WRONGFUL DEATH
<input type="checkbox"/>	XVI	OTHER:
<input type="checkbox"/>	XVII	OTHER:

If Count XVI or Count XVII is alleged, additional facts supporting the claim(s):

V. JURY DEMAND

12. Plaintiff(s) hereby demand(s) a trial by jury as to all claims in this action.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff(s) has/have been damaged as a result of Defendants' actions or inactions and demand(s) judgment against Defendants on each of the above-referenced causes of action, jointly and severally to the full extent available in law or equity, as requested in the Master Personal Injury Complaint.

Check if Applicable	COUNT	Cause of Action
<input type="checkbox"/>	XII	UNJUST ENRICHMENT
<input checked="" type="checkbox"/>	XIII	LOSS OF CONSORTIUM
<input type="checkbox"/>	XIV	SURVIVAL ACTION
<input type="checkbox"/>	XV	WRONGFUL DEATH
<input type="checkbox"/>	XVI	OTHER:
<input type="checkbox"/>	XVII	OTHER:

If Count XVI or Count XVII is alleged, additional facts supporting the claim(s):

V. JURY DEMAND

12. Plaintiff(s) hereby demand(s) a trial by jury as to all claims in this action.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff(s) has/have been damaged as a result of Defendants' actions or inactions and demand(s) judgment against Defendants on each of the above-referenced causes of action, jointly and severally to the full extent available in law or equity, as requested in the Master Personal Injury Complaint.